

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PARETEUM SECURITIES LITIGATION

Case No.: 19-CV-09767 (AKH) (GWG)

**NOTICE OF INDIVIDUAL DEFENDANTS' MOTION TO DISMISS
THE FIRST AMENDED CONSOLIDATED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Individual Defendants' Motion to Dismiss the First Amended Consolidated Complaint; the Memorandum of Law in Support of Defendant Pareteum's Motion to Dismiss the First Amended Consolidated Complaint, and the Foresta Declaration and exhibits filed in support thereof; and all prior proceedings, pleadings, and filings in this Action, Defendants Victor Bozzo, Denis McCarthy, Edward O'Donnell, and Robert H. Turner (the "Individual Defendants") will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at a time to be determined by the Court, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to the Private Securities Litigation Reform Act of 1995 ("Reform Act") and Federal Rules of Civil Procedure 12(b)(6) and 9(b) dismissing Plaintiffs' First Amended Consolidated Complaint, and granting such other relief as the Court may deem just and proper.

Dated: August 3, 2020

Respectfully submitted,

/s/ Genevieve York-Erwin
Douglas W. Greene (*pro hac vice* pending)
Genevieve York-Erwin
Chardaie Charlemagne
45 Rockefeller Plaza
New York, NY 10111
Tel:(212) 589-4200
Fax: (212) 589-4201
Email: dgreene@bakerlaw.com
gyorkerwin@bakerlaw.com
ccharlemagne@bakerlaw.com

Attorneys for the Individual Defendants